

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

_____)	
Sean Brazil,)	
)	
Plaintiff)	Civil Action No. 1:16-cv-271 (NRB)
)	
v.)	
)	
Bristol-Myers Squibb Company, Otsuka)	NOTICE OF MOTION
Pharmaceutical Co., Ltd., and Otsuka)	TO DISMISS COMPLAINT
America Pharmaceutical Inc.,)	
)	
Defendants.)	
_____)	

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendant Otsuka Pharmaceutical Co., Ltd.'s ("OPC") Motion to Dismiss the Complaint (Dkt. 1) ("Memorandum") and supporting Declaration of Tatsuro Watanabe dated March 22, 2016 ("Declaration"), OPC hereby moves before the Honorable Naomi Reice Buchwald, in Courtroom 21A at Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007-1312, on a date and time to be determined by the Court, under Federal Rule of Civil Procedure 12(b)(2), for an order dismissing the Complaint with prejudice as to OPC, and for such other relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that per the briefing schedule agreed to by the parties and so-ordered by the Court, opposition papers must be served by May 19, 2016.

Dated: April 5, 2016

Respectfully submitted,

WINSTON & STRAWN LLP

/s/ Luke A. Connelly

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(Appearing Specially)*

CERTIFICATE OF SERVICE

I, Luke A. Connelly, hereby certify that on April 5, 2016, I served the foregoing by operation of the Court's CM/ECF system, which will serve all counsel of record.

/s/ Luke A. Connelly
Luke A. Connelly